

MTC Resolution 3434 Draft TOD Policy Comments

Thank you for the opportunity to comment on the MTC Resolution 3434 Draft TOD Policy. One of our members attended the TOD Policy Workshop on May 25, 2005. Based on that presentation and the policy document, we offer the following comments.

The overall goals expressed in the Draft TOD Policy are clear. Emphasis on improving the cost effectiveness of regional transit investments and creating vibrant new communities through mandated local land use policies is innovative. The TOD policy attempts to offer flexibility while enforcing a vision of transit oriented uses close to transit centers and stations.

One major transit corridor seems to be missing from Table 3. The Capitol Corridor has additional new stations (including Union City) planned along its East Bay alignment. This major project deserves to be included and evaluated under Resolution 3434 as these stations will often serve multiple transit functions.

It appears the proposed corridor approach may not permit planning, engineering, and construction to proceed in one location when other jurisdictions lag in their planning process. The policy states that each corridor must meet the jobs and housing threshold prior to the release of regional discretionary funds. For example, Union City is ahead of some other jurisdictions on the Dumbarton corridor with the development of a comprehensive station plan, EIR preparation, and basic infrastructure construction. It will not benefit the corridor or the region to delay the Union City station pending preparation of station plans for all proposed corridor stations. The policy does not address the possibility of nonparticipating, uncooperative, or resistant local governments holding up funding for the entire corridor.

The policy's reliance on transit corridor coordination may inhibit individual station design. Requiring agreement between multiple local jurisdictions makes creation of optimal solutions for each city less likely. Interjurisdictional competition for job creating land use designations is not a healthy way to stimulate the integration of housing, jobs, and supporting retail and community uses needed for a sustainable transit oriented development.

The requirement that the distribution of jobs and housing units be handled by the Corridor Working Group is troubling. The Corridor Working Group concept creates an opportunity for one jurisdiction to stymie the plans of its neighbors even when those plans clearly meet the MTC goals and standards.

The presentation on May 25th indicated that the Corridor Working Groups may assign 'roles' to various stations such as housing in one and jobs in another. This may be a workable solution within a given city, but it does not allow individual jurisdictions flexibility to address their own needs. A stronger emphasis on mixed use development at every station rather than the focus on housing numbers would be a good start to remedying this problem.

Station area planning must include more than minimum housing requirements with jobs as an after thought and with no weight at all given to supportive retail, community, and professional services. No mention is made of arenas, theaters, etc. that draw large numbers of users and create significant transit use when located close to major transit hubs.

Although the draft TOD policy states other uses are critical elements for quality TOD, the method of evaluating corridor performance appears to focus on meeting minimum housing numbers with passing reference to job generation.

Equating housing units and jobs is not a useful way of providing flexibility or opportunity for innovative design solutions. It fails to encourage a balanced approach to job and housing development. How will nontraditional land uses such as live/work units be counted?

Strict adherence to corridor level thresholds does not encourage a sustainable mix of uses at each station. It lacks sensitivity to local visioning and does not guarantee a healthy distribution of land uses along the corridor. Individual station evaluation is essential to the policy goal of creating vibrant communities. Station areas with 24 hour land use characteristics enhance transit ridership.

The draft TOD Policy is a good starting point for regional transit planning. By including the station area land uses in early transit system design, the resulting projects will make better use of regional discretionary funding. However, the rigidity of the corridor working group concept does not allow individual jurisdictions flexibility to create the vibrant sustainable communities envisioned in the policy goals. The corridor threshold formula fails to include the supporting commercial, community, and professional services that make TOD successful. Inclusion of a more clearly defined mixed use model for each station area would improve the viability of the TOD proposed by the draft policy.

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